

Department of Energy

ROCKY FLATS OFFICE  
P.O. BOX 926  
GOLDEN, COLORADO 80402-0926



92-DOE-12776

NOV 05 1992

Mr. Martin Hestmark  
U.S. Environmental Protection Agency, Region VIII  
ATTN: Rocky Flats Project Manager, 8HWM-RI  
999 18th Street, Suite 500, 8WM-C  
Denver, Colorado 80202-2405

Mr. Gary Baughman  
Hazardous Waste Facilities Unit Leader  
Colorado Department of Health  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

Gentlemen:

Please find enclosed minutes from the September 24, 1992 meeting, regarding EPA and CDH comments on the revised Draft Phase I RFI/RI Workplan for OU 8 (700 Area). We request that the minutes be reviewed for accuracy and completeness.

Questions or concerns should be directed to Bruce Thatcher of my staff at 966-3532.

Sincerely,

*James K. Hartman*  
James K. Hartman  
Assistant Manager  
for Environmental Management

Enclosure

cc w/Enclosure:  
J. Ciocco, EM-453  
B. Fraser, EPA  
H. Ainscough, CDH

cc w/o Enclosure:  
R. Schassburger, ERD, RFO  
B. Thatcher, ERD, RFO  
R. Benedetti, EG&G  
B. Peterman, EG&G

ACTION	
DIST.	LTR ENC
ENJAMIN, A.	
ERMAN, H.S.	
ARNIVAL, G.J.	
OPP, R.D.	
ORDOVA, R.C.	
AVIS, J.G.	
ERRERA, D.W.	
ANNI, B.J.	
HEALY, T.J.	
ILBIG, J.G.	
DEKER, E.H.	
ERSH, J.M.	
IRBY, W.A.	
UESTER, A.W.	
EE, E.M.	
ANN, H.P.	
ARX, G.E.	
ACKENNA, F.G.	
ONTROSE, J.K.	
MORGAN, R.V.	
PIZZUTO, V.M.	
POTTER, G.L.	
RILEY, J.H.	
SANDLIN, N.B.	
SATTERWHITE, D.G.	
SCHUBERT, A.L.	
SHEPLER, R.L.	
SULLIVAN, M.T.	
SWANSON, E.R.	
WHITE, B.L.	
WINSON, R.B.	
W.J.M.	
ZAL, J.O.	
Benedetti	X
Peterman	X

CORRES CONTROL	x	x
TRAFFIC		

Reviewed for Addressee  
Corres. Control: RFP

1-9-92 *Ci*  
DATE BY

Ref Ltr. #

ADMIN RECORD

## ATTACHMENT 1

OU-8 RFL/RI WP Comment Resolution 9-24-92

Name	Org	Phone
Harlan Armstrong	Gl. Dept. of Health	331-4977 (692-10)
Bill Fraser	EPA	294-1081
Bruce Thatcher	<del>EG&amp;G</del> DOE	966-8659 37
Theresa Samuels-Dreiling	AST	980-0036
James Shaffner	AST	980-0036
Mike Wintermire	AST	980-0036
Bruce Peterman	EG&G	966-8659

Meeting Minutes for 9/24/92  
CDH & EPA Comments  
Mr. B. Peterman, EG&G  
October 21, 1992  
Page 3 of 9

## ATTACHMENT 2



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

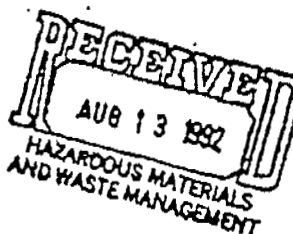
REGION VIII

233 18th STREET - SUITE 800  
DENVER, COLORADO 80202-2466

AG 12 1992

Ref: KBWM--FF

Mr. Gary Baughman  
Hazardous Waste Facilities Unit Leader  
Colorado Department of Health  
4210 East 11th Avenue  
Denver, Colorado 80220-3716



RE: Review of OU 8 Draft RFI/RI Work Plan

Dear Mr. Baughman:

Enclosed is the Environmental Protection Agency's technical review of the Draft RFI/RI Work Plan for Operable Unit 8, Rocky Flats Plant. There are many comments that need to be addressed, especially with regard to the field sampling plan.

The most general shortcoming of this plan is that it fails to consider the Protected Area/LM/TRA now in development or other ongoing activities which make implementation as written very unlikely. In combination with DOE's apparent lack of commitment to the IAG as documented in other correspondence, this failure reduces the work plan to a paperwork exercise which achieves only superficial compliance with established milestones. Until and unless this work plan can be integrated into DOE's overall approach to the Treatment, D&D, and Environmental Restoration of Rocky Flats, EPA sees no reason to grant approval of it.

If you or members of your staff have any questions regarding EPA's comments, please contact Bill Frazer at 294-1081.

Sincerely,

Martin Hestmark, Manager  
Rocky Flats Project

Enclosure

cc: w/enc.  
Harlan Ainscough, CDH  
Skip Dinges, PRC

Meeting Minutes for 9/24/92  
CDH & EPA Comments  
Mr. B. Peterman, EG&G  
October 21, 1992  
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## ATTACHMENT 2

AT 10123

11-82 PRI 8184

JHM

FAX NO. 3314401

P. 03

P. 02

Colorado Department of Health  
Hazardous Materials & Waste Management Division  
Comments  
ON  
DRAFT  
PHASE I  
EYT/RI WORK PLAN  
FOR  
ROCKY PLATE PLANT  
700 AREA  
Operable Unit NO. 8  
May, 1992  
as supplemented on  
JUNE 22, 1992

## ATTACHMENT 3

### General Comments:

1. Bill Fraser stated the scheduled date for delivery of the OU8 Final Work Plan has been extended to December 1, 1992.
2. B. Fraser stated CDH and DOE may want to consider re-scoping the document in the areas involving surface water and groundwater. Bruce Thatcher stated that due to previous meetings with CDH & EPA on the Industrial Area, the agencies may wish to remove surface and groundwater from investigation in OU8. Harlen Ainscough stated the since the IM/TRA for OU-12 is not yet set, thus the OU8 plan should continue as is to include those investigations while concentrating on soils. B. Thatcher stated groundwater investigations could be staged with a Technical Memo (TM) in the eventuality may be included in OU-12.
3. H. Ainscough stated sediment sampling should be accelerated to be included in early stages of the Plan. Jim Shaffer stated that in place of early-staged sampling XRF screening for metals is now planned to assist in selecting future sampling sites, therefore deferring sampling to later substage(s). H. Ainscough agreed that XRF screening could be used in that manner.
4. H. Ainscough said IAG Table 5 was 'passe' and need not be adopted or addressed in its entirety. Re-staging of Table 5 is acceptable. The number and locations of borings or wells are not appropriate in the work plan under development, but should be deferred until screening or other results are presented in a TM and the number of drill sites and specific locations justified by the results. The Work Plan should state if the level-of-effort in IAG Table 5 is appropriate or considered a minimum LOE.
5. H. Ainscough stated the list of analytes did not appear to relate to conditions at the specific IHSS. J. Shaffer stated the list also include those related to conditions existing at adjacent IHSSs, but would be revised in the final Plan to address only the specific IHSS(s) of interest or under investigation.

### EPA Comments Discussion and Resolution:

Page	Comment	Text
Number	Number	Section Agency Consensus or Disposition

- |   |   |     |  |
|---|---|-----|--|
| 2 | 2 | 2.0 | ASI: Information developed by Doty & Assoc. for this work plan indicates IHSS 150.5 is equivalent IHSS 123.2, which was transferred to OU-9. ASI will prepare a letter to EG&G showing the IHSS similarities and B. Fraser/H. Ainscough will send letter to DOE removing both IHSSs from OU-8.   |
| 2 | 4 | 2.0 | ASI: Doty & Assoc. information developed concurrent with the Final HRR (but excluded in that HRR) justifies that many of the IHSS boundaries should be changed. H. Ainscough will accept the changes, but requested the information be included in the Plan. ASI referred him to Appendix B wherein the information is presented. EPA/CDH accepted the boundary changes provided justification is contained in Appendix B. |

### ATTACHMENT 3 (cont.)

Page Number	Comment Number	Text Section	Agency Consensus or Disposition
3	8	3.0	B. Fraser: ASI should (will) coordinate with Bruce Peterman to obtain the most current list of Chemical Specific Benchmarks. Possibly from the OU-5 or OU-6 work plans.
3	9	5.0	B. Fraser: DOE should provide a discussion of a statistical approach for selecting location and number of sampling locations. DOE (B. Thatcher) stated that via B. Peterman it will discuss this need with ASI and text will be revised to include the methodology to include probabilities, powers, confidence factors, etc. related to sampling. The methodology will likely follow that of OU-10.
4	11	8.0	B. Thatcher stated the last TM may be the place to discuss the future land use for Rocky Flats; however, it is not appropriate for discussion in this Plan. B. Fraser/H. Ainscough agreed stating "the battle goes on" and is yet to be resolved or finalized.
4	12	8.0	B. Thatcher: Contaminants of Concern will be like those in the TM for OU-1. B. Fraser accepted.
4	13	8.0	B. Thatcher stated the text for this section will be revised to include a statement that the plans for ecotoxicological studies will be detailed in a subsequent TM. B. Fraser accepted.
6	6	1.6.7.2	B. Thatcher stated that resolution of the two channel interpretations for the entire plant site is beyond the scope of OU-8. Lacking reliable IHSS boundaries and historical data that specifically locates release site(s), the location and number of deep drill sites is inappropriate at this time for inclusion in the Plan. Consequently, the geologic information necessary to resolve the two interpretations will not be available until following later TMs. Also, the work plan is restricted to OU-8 and information from outside OU-8 will likely be necessary to resolve the interpretations. B. Fraser accepted this stating the plan should not propose bedrock investigations (i.e., bedrock drilling) at this time.
9	16	Figs.	ASI stated the interpretation of sandstone channel(s) will be added to conceptual model figures 2.5-4 and 2.5-5 B. Fraser and H. Ainscough accepted.

### ATTACHMENT 3 (cont.)

<u>Page</u>	<u>Comment</u>	<u>Text</u>
<u>Number</u>	<u>Number</u>	<u>Section Agency Consensus or Disposition</u>
10	4	5.2.1.1 B. Fraser stated the role of the agencies in the RI must be stated. The IAG and NCP has the information requested; CDH has the CAP; DOE will write RA and ROD; EPA will approve or disapprove RA or ROD. B. Thatcher said the BRA and CMS decisions process must be addressed.
10	4	5.2.1.1 B. Fraser stated the data end users (primary/secondary) was not applicable.
11	3	6.0 B. Fraser: At sites under asphalt (paving) for events occurring prior to paving, soil samples should be collected under the road base; if release occurred after paving then sample the road base. Thickness of the road base should also be recorded.
11	4	6.0 Mike Waltermire stated the commentor was likely confused; the HPGe radius of investigation may pick up "off-IHSS" sources of radionuclides. This will be clarified in the Plan text.
11	5	6.0 J. Shaffer: ASI intends to use the FIDLER and GM for health and safety purposes. The sodium-iodide detector will be use in place of the FIDLER at IHSS investigations. ASI does not have control on delivery or availability of SOPs. ASI will provide references to SOPs which are applicable and available. H. Ainscough stated CDH has requested the SOP for the HPGe.
11	6	6.0 B. Thatcher stated soil borings will provide for the acquisition of geotechnical data cited by EPA, excluding cation exchange capacity. The aspect of the Plan will be comparable to that presented in OU-12. B. Fraser accepted.
13	5	8.1.2 B. Thatcher requested CDH/EPA send a letter to DOE stating the urgency and requesting collection of background data so DOE can obtain the funding. Until funded the OU-8 Plan will not include background studies. H. Ainscough accepted.
14	10	8.2.4 B. Thatcher stated a RA would not be performed on Class A contaminants-of-concern from background data. B.Fraser accepted, H. Ainscough offered no response.

## ATTACHMENT 3 (cont.)

Page    Comment Text  
Number   Number   Section   Agency   Consensus or Disposition

15      1      10.1.12.1 B. Thatcher stated a discussion of the HPGe was not appropriate here. ASI should make reference to the SOP, only. B. Fraser accepted.

### CDH Comments Discussion and Resolution:

2      6      -      H. Ainscough admitted he overlooked the investigation of footing drains in Section 6.0. ASI was requested to clarify the text for the TM that sampling will be performed after TM#1 (and substage 2) results are approved by both CDH and EPA.

3      -      2.3.2    ASI identified that portions of CDH comment text was not transmitted for parts of pages 4, 5, and 6. B. Peterman will provide these to ASI.

7      -      2.5.3.1.1 H. Ainscough requested ASI further elaborate and identify contaminants-of-concern that may have been released (have existed) with the cooling tower blowdown or in the process waters. These COCs should be more than just the general type of contaminants.

8      -      5.2.1.1 B. Thatcher stated DOE does not plan to go down to the division level within major organizations or agencies to identify data users. H. Ainscough accepted.

9      1      6.0      H. Ainscough stated DQOs can stay essentially the way they are currently presented; however, the section MUST provide specific rationale (justification) stating why particular investigations (i.e., area, investigation type, samples numbers, locations, etc.) were selected or planned. More text with rationale vs. the table listing investigations is required. ASI does not need to repeat information already presented in Section 2; cite the needed information by means of a reference to the appropriate Section.

10     5      6.0      B. Thatcher stated the text in section 6.0 will include a statement that, as necessary, investigations will continue beyond the boundary of the IHSS of interest. Investigations would continue, using the TM process, so as to allow for complete delineation and characterization of existing site



### ATTACHMENT 3 (cont.)

Page	Comment	Text
<u>Number</u>	<u>Number</u>	<u>Section Agency Consensus or Disposition</u>
10	5	6.0 contamination, to be halted at the boundary of an IHSS contained within another OU, or at the limits of OU-8. H. Ainscough accepted.
10	6	6.0 B. Thatcher stated that in place of attempting to achieve a 95 % confidence level for all sampling, the quantity of sampling will be evaluated in TMs on a power vs. cost basis. The agencies would have the opportunity to approve the sampling efforts, methodology, and overall program through the staged TMs and prior to implementation of sampling, follow-on investigations or screening, or installation of borings and wells. The approach would be similar to that approved in the OU-10 work plan. H. Ainscough approved.
10	Table 2.37	H. Ainscough accepted ASIs plan to include XRF screening at IHSSs where metals are potential contaminants. This screening would be conducted in place of implementing soil sampling in the initial stage of investigations. Results of the screening would be included and evaluated in the subsequent TM. This permits a much more informed approach to all aspects of sampling at the various IHSSs than current knowledge of site conditions allows.
12	Last Para.	B. Thatcher stated "benchmarks levels" for the air and soil gas do not exist. Standards for detection of contaminants are based on the detection levels of equipment used and are ultimately discussed in the SOPs for the investigation method. Regardless of negative or inconclusive results, the plan will state a confirmatory boring(s) with soil sampling will be installed at each IHSS where screening investigations (i.e., XRF, HPGe, GPR, magnetics, soil gas, etc.) are to be conducted. H. Ainscough accepted the approach stating the plan should clearly identify the standards or benchmarks to govern quantitative or analytical data obtained during screening for initial "hot spot" location or delineation of contaminants. SOPs can be used as the source of the standards.

### ATTACHMENT 3 (cont.)

Page	Comment	Text
<u>Number</u>	<u>Number</u>	<u>Section Agency Consensus or Disposition</u>
15	163.2 6.0	J. Shaffer stated that GPR and magnetic geophysical techniques are now planned for investigations at IHSS 163.2 to locate the "buried" slab. A confirmatory boring(s) may be recommended in the subsequent TM to further determine the presence/absence of the slab. H. Ainscough accepted.
16	Fig. 7-1 7.0	H. Ainscough request the figure include a 6 week review period from the delivery date of the OU-8 Final RFI/RI Work Plan and its approval by the agencies. J. Shaffer (ASD) expressed some concern with the time in the IAG schedule and the ability to develop a realistic RI schedule.
17	1st Para 8.0	H. Ainscough accepted the points made by B. Thatcher that inclusion of the scenario considering future onsite (on RFP site) residents is not appropriate for inclusion in the risk assessment. Final land use of the RFP lands have not been determined and the scenario is not likely.
17	2nd Para 8.0	H. Ainscough stated acceptance of the approach in the Plan to implement groundwater sampling in later stages of the RFI/RI. The reference to a Phase II investigation is not appropriate as Phase II is not defined in the IAG for OU-8. B. Fraser asked that text be added to indicate some wells may be recommended for installation based on investigation results to be presented in TM number two.

The meeting was adjourned at 15:30 hours.